

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

LeMond Cycling, Inc.,

Plaintiff,

v.

Trek Bicycle Corporation,

Defendant/Third-Party Plaintiff,

v.

Greg LeMond,

Third-Party Defendant.

Case No. 08-CV-01010 (RHK/JSM)

**PLAINTIFF'S THIRD SET OF
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS**

TO: Defendant Trek Bicycle Corporation and its attorneys.

Pursuant to the Federal Rules of Civil Procedure, Plaintiff LeMond Cycling, Inc. requires that Defendant Trek Bicycle Corporation answer the following Third Set of Interrogatories and Requests for Production of Documents (hereinafter "Second Set"), within thirty (30) days and in accordance with the provisions prescribed by such rules.

I. DEFINITIONS & INSTRUCTIONS

A. Plaintiff hereby incorporates Plaintiff's Definitions and Instructions provided in Plaintiff's First Set of Discovery Requests to Plaintiff.

B. In responding to these Requests, Trek is not required to produce identical copies of documents that it has already produced in response to Plaintiff's previous requests for production.

II. INTERROGATORIES

INTERROGATORY NO. 12: Identify the three individuals most knowledgeable regarding Trek's efforts to develop and promote road bikes being sold under the Gary Fisher brand.

III. DOCUMENT REQUESTS

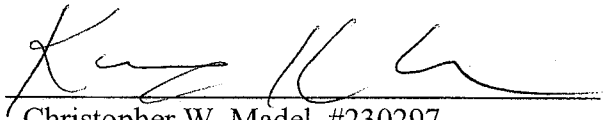
REQUEST NO. 29: All documents showing the development and promotion of road bikes being sold under the Gary Fisher brand.

REQUEST NO. 30: From 1995 to the present, all financial statements showing sales of Trek bikes, whether under the Trek brand or a brand licensed or sublicensed to Trek, in each country listed on Exhibit 1.02 of the Agreement.

REQUEST NO. 31: All documents related to work done with Public Strategies Inc. related to Trek's relationship with LeMond Cycling, Inc., Greg LeMond, or Lance Armstrong.

Dated: April 17, 2009

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By: 
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ATTORNEYS FOR PLAINTIFF LEMON
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Weber Decl., Exhibit F